

1 SIGAL CHATTAH
2 United States Attorney
3 District of Nevada
4 Nevada Bar No. 8264

5 KARISSA D. NEFF
6 Assistant United States Attorney
7 Nevada Bar No. 12504
8 501 Las Vegas Blvd. So., Suite 1100
9 Las Vegas, Nevada 89101
(702) 388-6336
10 Karissa.Neff@usdoj.gov

11 *Attorneys for the United States*

12 **UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA**

14 Wild Horse Education, a non-profit
15 corporation,

16 v.
17 Plaintiff,

18 United States Department of Interior
19 Bureau of Land Management,

20 Defendant.

21 Case No. 3:25-cv-00152-MMD-CSD

22 **Joint Stipulation for Extension Of Time
23 To File Response To Amended
24 Complaint**

(Second Request)

25 Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule IA 6-1 of
26 this Court's Local Rules, Plaintiff Wild Horse Education, a non-profit corporation, and
27 Federal Defendant, United States Department of Interior, Bureau of Land Management
28 ("BLM"), through undersigned counsel, hereby stipulate and agree as follows:

29 1. Plaintiff filed its First Amended Complaint for Declaratory and Injunctive Relief
30 on July 03, 2025 (ECF No. 17).

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- 1 2. Per a stipulation and order, the parties agreed that Federal Defendant's response
- 2 to Plaintiff's Amended Complaint is due by July 25, 2025 (ECF No. 20).
- 3 3. The parties now agree to extend the time for Federal Defendant to respond to
- 4 Plaintiff's Amended Complaint up to and including August 22, 2025.
- 5 4. The BLM produced additional documents to Plaintiff on July 22, 2025, which the
- 6 BLM believes to be responsive to information Plaintiff requested.
- 7 5. Counsel for the Plaintiff will be out of the office for the next two weeks on pre-
- 8 scheduled leave.
- 9 6. In light of her pre-scheduled leave, Plaintiff's counsel needs additional time to
- 10 review the documents that the BLM produced to Plaintiff on July 22, 2025, and
- 11 confer with her client to determine if Plaintiff is satisfied with the documents
- 12 produced. Likewise, Federal Defendant needs the additional time to confer with
- 13 Plaintiff's counsel regarding whether BLM's production of documents satisfy
- 14 Plaintiff's FOIA request such that it can prepare any necessary response to
- 15 Plaintiff's Amended Complaint.

16 Accordingly, the Parties respectfully request that the Court extend the deadline for
17 the United States to file a responsive pleading to Plaintiff's Amended Complaint up to and
18 including August 22, 2025.

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1 This stipulated request is filed in good faith and not for the purpose of undue delay.

2 Respectfully submitted this 24th day of July 2025.

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4 BRENT M. RESH
Nevada Bar No. 14940
Brent Resh Law, PLLC
2401 La Solana Way
Las Vegas, Nevada 89102

SIGAL CHATTAH
United States Attorney

5 /s/ Karissa D. Neff
KARISSA D. NEFF
6 Assistant United States Attorney

7 /s/ Jessica L. Blome
JESSICA L. BLOME
8 J. RAE LOVKO
Greenfire Law, PC
9 2748 Adeline Street, Suite A
Berkley, California 947103
10 jblome@greenfirerlaw.com
rlovko@greenfirerlaw.com

Attorneys for the United States

11 Attorneys for Plaintiff

12 IT IS SO ORDERED:

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15 UNITED STATES MAGISTRATE JUDGE

16 DATED: July 25, 2025

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